

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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2005 JAN 25 P 3:22

CHRISTOPHER CAVALLARO,

Plaintiff,

U.S. DISTRICT COURT
DISTRICT OF MASS.

v.

Civil Action No. 04-cv-12512RWZ

PERFORMANCE MARINE ASSOCIATES
INSURANCE SERVICES, INC. and
ACE AMERICAN INSURANCE COMPANY,

Defendants,

**DEFENDANT ACE AMERICAN INSURANCE COMPANY'S
LR 16.1 CERTIFICATION**

Attached is a certification in compliance with LR 16.1 signed by counsel
and client.

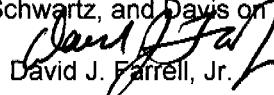
RESPECTFULLY SUBMITTED this 21st day of January 2005.

DAVID J. FARRELL, JR.
Attorney for Defendant
Ace American Insurance Company


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Certificate of Service

I certify I served a copy of this certification by mail on
Attorneys D'Angelo, Schwartz, and Davis on 1/21/05.


David J. Farrell, Jr.

ACE AMERICAN INSURANCE COMPANY'S LR 16.1 CERTIFICATION

Defendant Ace American Insurance Company, by and through its undersigned authorized representative and counsel of record, affirm that they have conferred

(a) with a view to establishing a budget for the costs of conducting the full course – and various alternative courses – of the litigation; and

(b) to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in LR 16.4.

Kristen Swingle
Kristen Swingle
ACE Marine Claims

David J. Farrell, Jr.
David J. Farrell, Jr.
BBO # 559847